

EXHIBIT 4

UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF PENNSYLVANIA

SHAMARA T. KING, on
behalf of herself and all others similarly
situated,

Plaintiff,

v.

GENERAL INFORMATION SERVICES,
INC.,

Defendants.

Case No.: 2:10-cv-06850-PBT

**DECLARATION OF JOHN HANKS IN SUPPORT OF
DEFENDANT'S MOTION FOR SUMMARY JUDGMENT**

Pursuant to 28 U.S.C. § 1746, I, John Hanks, declare as follows:

1. My name is John Hanks. I am over 21 years of age and am competent to give testimony. I am the Director of Public Records for General Information Services, Inc. ("GIS"). The facts herein are based upon my personal knowledge and my review of the business records of GIS.

2. In my role as the Director of Public Records for GIS, I oversee the operation of GIS's systems for accessing public record information to include in consumer reports prepared by GIS.

3. I have reviewed the allegations that Plaintiff Shamara T. King has made against GIS in case number 2:10-cv-06850-PBT currently pending in the United States District Court for the Eastern District of Pennsylvania (the "Lawsuit").

4. I am familiar with GIS's policies and procedures for preparing consumer reports.

5. I am familiar with how GIS gathers public record information, and the systems that GIS uses to retrieve records of conviction.

6. I am also familiar with the records in GIS's system regarding Plaintiff's consumer report at issue in the Lawsuit.

7. GIS utilizes an Online Court Interface ("OCI") system to gather public records of conviction information from certain jurisdictions, including Pennsylvania.

8. When a GIS report calls for information from Pennsylvania, the OCI system sends the consumer's first and last name to the Pennsylvania court record system. The OCI then matches the names against the public record index and downloads copies of any matching information.

9. Matching records are downloaded in PDF format directly into GIS's system and attached to the work order for a report in progress.

10. GIS subsequently matches a second piece of identifying information (such as social security number or date of birth) against all returned records to verify which records belong to the consumer who is the subject of the report.

11. With respect to Plaintiff's report that is the subject of the Lawsuit, on February 24, 2010, the OCI matched Plaintiff's first and last name in the Pennsylvania public record index and returned a records of conviction from the Court of Common Pleas of Montgomery County. GIS subsequently matched the date of birth from Plaintiff's records of conviction to Shamara T. King to ensure that the reported information matched Plaintiff.

12. Attached hereto as **Exhibit A** is a true and correct copy of Plaintiff's records of conviction that the OCI system downloaded from the Pennsylvania court system on February 24, 2010.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 29th day of April, 2013.



JOHN HANKS

A handwritten signature of "JOHN HANKS" enclosed within a roughly oval-shaped outline. The signature is written in a cursive style with three vertical strokes forming the letters "J", "H", and "N". A horizontal line extends from the right side of the oval.

EXHIBIT A

COURT OF COMMON PLEAS OF MONTGOMERY COUNTY**DOCKET****Docket Number: CP-46-CR-0001385-2000****CRIMINAL DOCKET****Court Case**

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CASE INFORMATIONJudge Assigned: Tressler, Paul W.Date Filed: 03/02/2000Initiation Date: 03/02/2000OTN: H1042204Lower Court Docket No: CR23-00Initial Issuing Authority:Final Issuing Authority:Arresting Agency: Upper Moreland Twp Police DeptArresting Officer: AffiantCase Local Number Type(s)Case Local Number(s)

Legacy Docket Number

0138500

STATUS INFORMATIONCase Status: ClosedStatus DateProcessing StatusArrest Date:

02/03/2000

06/17/2009

Completed

07/26/2000

Migrated Final Disposition

03/02/2000

Migrated Case

Complaint Date: 01/20/2000**CALENDAR EVENTS**

| <u>Case Calendar Event Type</u> | <u>Schedule Start Date</u> | <u>Start Time</u> | <u>Room</u> | <u>Judge Name</u> | <u>Schedule Status</u> |
|---------------------------------|----------------------------|-------------------|-------------|---------------------------|------------------------|
| Motion for Expungement | 05/13/2009 | 9:30 am | Courtroom 4 | Judge William T. Nicholas | Scheduled |
| Motion for Expungement | 06/17/2009 | 9:30 am | Courtroom 4 | Judge Stanley R. Ott | Scheduled |

CONFINEMENT INFORMATION

| <u>Confinement Known As Of</u> | <u>Confinement Type</u> | <u>Destination Location</u> | <u>Confinement Reason</u> | <u>Still in Custody</u> |
|--------------------------------|-------------------------|-----------------------------|---------------------------|-------------------------|
| | | | | |

DEFENDANT INFORMATIONDate Of Birth: [REDACTED]/1978 City/State/Zip: Philadelphia, PA 19124Alias Name
King, Shamara**CASE PARTICIPANTS**

| <u>Participant Type</u> | <u>Name</u> |
|-------------------------|------------------|
| Defendant | King, Shamara T. |

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BAIL INFORMATION

King, Shamara T.

Nebbia Status: None

| <u>Bail Action</u> | <u>Date</u> | <u>Bail Type</u> | <u>Percentage</u> | <u>Amount</u> | <u>Bail Posting Status</u> | <u>Posting Date</u> |
|--------------------|-------------|----------------------------|-------------------|---------------|----------------------------|---------------------|
| Set | 02/03/2000 | Monetary - Cash Percentage | 10.00% | \$10,000.00 | Posted | 02/04/2000 |

CHARGES

| <u>Seq.</u> | <u>Orig Seq.</u> | <u>Grade</u> | <u>Statute</u> | <u>Statute Description</u> | <u>Offense Date</u> | <u>OTN</u> |
|-------------|------------------|--------------|------------------------|---|---------------------|------------|
| 1 | 1 | F3 | 18 § 3921 §§A | Criminal Conspiracy Engaging - Theft By Unlaw Taking-Movable Prop | 01/08/2000 | H1042204 |
| 2 | 2 | F3 | 18 § 3921 §§A | Criminal Conspiracy Engaging - Theft By Unlaw Taking-Movable Prop | 01/08/2000 | H1042204 |
| 3 | 3 | F3 | 18 § 3921 §§A | Criminal Conspiracy Engaging - Theft By Unlaw Taking-Movable Prop | 01/08/2000 | H1042204 |
| 4 | 4 | F3 | 18 § 3921 §§A | Criminal Conspiracy Engaging - Theft By Unlaw Taking-Movable Prop | 01/08/2000 | H1042204 |
| 5 | 5 | F3 | 18 § 3921 §§A | Criminal Conspiracy Engaging - Theft By Unlaw Taking-Movable Prop | 01/08/2000 | H1042204 |
| 6 | 6 | F3 | 18 § 3921 §§A | Criminal Conspiracy Engaging - Theft By Unlaw Taking-Movable Prop | 01/08/2000 | H1042204 |
| 7 | 7 | F3 | 18 § 3921 §§A | Criminal Conspiracy Engaging - Theft By Unlaw Taking-Movable Prop | 01/08/2000 | H1042204 |
| 8 | 8 | F3 | 18 § 3921 §§A | Criminal Conspiracy Engaging - Theft By Unlaw Taking-Movable Prop | 01/08/2000 | H1042204 |
| 9 | 9 | S | 75 § 1543 §§A | Driv While Oper Priv Susp Or Revoked | 01/08/2000 | H1042204 |
| 10 | 10 | F2 | 18 § 3502 §§A | Criminal Conspiracy Engaging - Burglary | 01/08/2000 | H1042204 |
| 11 | 11 | | 18 § 3503 §§A1I | Criminal Conspiracy Engaging - Crim Tres-Enter Structure | 01/08/2000 | H1042204 |

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DISPOSITION SENTENCING/PENALTIES**Disposition**Case EventDisposition DateFinal DispositionSequence/DescriptionOffense DispositionSectionSentencing JudgeSentence DateCredit For Time ServedSentence/Diversion Program TypeIncarceration/Diversionary PeriodStart DateSentence ConditionsLink TypeLinked Docket NumberLinked Offense - Sentence**Migrated Disposition**

Migrated Dispositional Event

07/26/2000

Final Disposition

1 / Criminal Conspiracy Engaging - Theft By Unlaw
Taking-Movable Prop

Guilty Plea

18§903§§A1

Migrated, Judge

07/26/2000

Financial Assessments

Max of 3.00 Years

07/26/2000

Probation

Max of 3.00 Years

07/26/2000

2 / Criminal Conspiracy Engaging - Theft By Unlaw
Taking-Movable Prop

Nolle Prossed

18§903§§A1

Migrated, Judge

07/26/2000

Financial Assessments

07/26/2000

3 / Criminal Conspiracy Engaging - Theft By Unlaw
Taking-Movable Prop

Nolle Prossed

18§903§§A1

Migrated, Judge

07/26/2000

Financial Assessments

07/26/2000

4 / Criminal Conspiracy Engaging - Theft By Unlaw
Taking-Movable Prop

Nolle Prossed

18§903§§A1

Migrated, Judge

07/26/2000

Financial Assessments

07/26/2000

5 / Criminal Conspiracy Engaging - Theft By Unlaw
Taking-Movable Prop

Nolle Prossed

18§903§§A1

Migrated, Judge

07/26/2000

Financial Assessments

07/26/2000

6 / Criminal Conspiracy Engaging - Theft By Unlaw
Taking-Movable Prop

Nolle Prossed

18§903§§A1

Migrated, Judge

07/26/2000

Financial Assessments

07/26/2000

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DISPOSITION SENTENCING/PENALTIESDispositionCase EventDisposition DateFinal DispositionSequence/DescriptionOffense DispositionSectionSentencing JudgeSentence DateCredit For Time ServedSentence/Diversion Program TypeIncarceration/Diversionary PeriodStart DateSentence ConditionsLinked Offense - SentenceLink TypeLinked Docket Number7 / Criminal Conspiracy Engaging - Theft By Unlaw
Taking-Movable Prop

Nolle Prossed

18§903§§A1

Migrated, Judge

07/26/2000

Financial Assessments

07/26/2000

8 / Criminal Conspiracy Engaging - Theft By Unlaw
Taking-Movable Prop

Nolle Prossed

18§903§§A1

Migrated, Judge

07/26/2000

Financial Assessments

07/26/2000

9 / Driv While Oper Priv Susp Or Revoked

Nolle Prossed

75§1543§§A

Migrated, Judge

07/26/2000

Financial Assessments

07/26/2000

10 / Criminal Conspiracy Engaging - Burglary

Nolle Prossed

18§903§§A1

Migrated, Judge

07/26/2000

Financial Assessments

07/26/2000

11 / Criminal Conspiracy Engaging - Crim

Nolle Prossed

18§903§§A1

Tres-Enter Structure

07/26/2000

Migrated, Judge

07/26/2000

Financial Assessments

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COMMONWEALTH INFORMATION**ATTORNEY INFORMATION**

Name: Steven Jay Latzer, Esq.
 District Attorney

Supreme Court No: 069951

Phone Number(s):
 (610) 278-3132 (Phone)

Address:
 Montgomery County District Attorney's Office
 Swede & Airy Sts PO Box 311
 Norristown PA 19404--0311

Name: Harry R. Seay, Esq.
 Private

Supreme Court No: 015438

Rep. Status: Active
Phone Number(s):

(215) 735-5300 (Phone)
 (215) 546-7473 (Fax)

Address:
 Clark & McGill, P.C.
 230 S Broad St 2nd Fl
 Philadelphia PA 19102--4121

Representing: King, Shamara T.

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ENTRIES

| <u>Sequence Number</u> | <u>CP Filed Date</u> | <u>Document Date</u> | |
|------------------------|---|----------------------|-----------------------|
| <u>Service To</u> | | <u>Service By</u> | <u>Filed By</u> |
| <u>Issue Date</u> | <u>Service Type</u> | <u>Status Date</u> | <u>Service Status</u> |
| 1 | 02/04/2000 | | |
| | 002 BAIL POSTED IN THE SUM OF \$1,00 | | |
| | BAIL POSTED IN THE SUM OF \$1,000.00 10% | | |
| | | | Migrated, Filer |
| 1 | 02/28/2000 | | |
| | 003 NOTICE FOR ARRAIGNMENT ON 04/28 | | |
| | NOTICE FOR ARRAIGNMENT ON 04/28/2000 | | |
| | | | Migrated, Filer |
| 1 | 02/28/2000 | | |
| | 001 PAPERS INCLUDED WITH TRANSCRIPT | | |
| | PAPERS INCLUDED WITH TRANSCRIPT | | |
| | | | Migrated, Filer |
| 1 | 03/02/2000 | | |
| | Original Papers Received from Lower Court | | |
| | | | Unknown Filer |
| 1 | 04/24/2000 | | |
| | 005 BILLS OF INFORMATION | | |
| | BILLS OF INFORMATION | | |
| | | | Migrated, Filer |
| 1 | 04/28/2000 | | |
| | 006 PRAECIPE TO ENTER APPEARANCE HA | | |
| | PRAECIPE TO ENTER APPEARANCE HARRY SEAY | | |
| | | | Migrated, Filer |
| 2 | 04/28/2000 | | |
| | 007 WAIVER OF ARRAIGNMENT | | |
| | WAIVER OF ARRAIGNMENT | | |
| | | | Migrated, Filer |

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|------------------------|--|----------------------|-----------------------|
| <u>Service To</u> | | <u>Service By</u> | <u>Filed By</u> |
| <u>Issue Date</u> | <u>Service Type</u> | <u>Status Date</u> | <u>Service Status</u> |
| 1 | 07/11/2000 | | |
| | 008 CONTINUED TO PASSED TO 07/26/2000 | | |
| | CONTINUED TO PASSED TO 07/26/2000 (TRIAL) J DELRICCI | | |
| | | | Migrated, Filer |
| 1 | 07/26/2000 | | |
| | 010 GUILTY PLEA JUDGE DELRICCI | | |
| | GUILTY PLEA JUDGE DELRICCI | | |
| | | | Migrated, Filer |
| 1 | 07/26/2000 | | |
| | 015 GUILTY PLEA J DELRICCI | | |
| | GUILTY PLEA J DELRICCI | | |
| | | | Migrated, Filer |
| 1 | 07/26/2000 | | |
| | 023 HEARING/CT.REPORTER GP/C OLIVEI | | |
| | HEARING/CT.REPORTER GP/C OLIVEIRA | | |
| | | | Migrated, Filer |
| 1 | 07/26/2000 | | |
| | Migrated Automatic Registry Entry (| | |
| | Migrated Automatic Registry Entry (Disposition) Text | | |
| | | | Migrated, Filer |
| 2 | 07/26/2000 | | |
| | Migrated Sentence | | |
| | Migrated Sentence | | |
| | | | Migrated, Filer |
| 1 | 07/31/2000 | | |
| | 013 RECORD MODIFICATION 1546,00AH,D | | |
| | RECORD MODIFICATION 1546,00AH,DMC,CL-STATUS -6 | | |
| | | | Migrated, Filer |

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|------------------------|---|----------------------|-----------------------|
| <u>Service To</u> | | <u>Service By</u> | <u>Filed By</u> |
| <u>Issue Date</u> | <u>Service Type</u> | <u>Status Date</u> | <u>Service Status</u> |
| 1 | 08/01/2000 | | |
| | 016 RECORD MODIFICATION 1259,C6,MAH | | |
| | RECORD MODIFICATION 1259,C6,MAH,CL-STATUS -L | | |
| | | | Migrated, Filer |
| 1 | 08/11/2000 | | |
| | 019 CLERK OF COURT GENERAL \$900 SUP | | |
| | CLERK OF COURT GENERAL \$900 SUPERVISION FEE REMOVED PER APO | | |
| | | | Migrated, Filer |
| 1 | 08/29/2000 | | |
| | 020 CASH BAIL REFUND 08/29/2000 \$80 | | |
| | CASH BAIL REFUND 08/29/2000 \$800.00 BRENTA HAYES;911 W FISHER AVE; PHILA, PA 19141 | | |
| | | | Migrated, Filer |
| 1 | 09/12/2000 | | |
| | 022 TESTIMONY TAKEN BEFORE J DELRIC | | |
| | TESTIMONY TAKEN BEFORE J DELRICCI 07/26/2000 | | |
| | | | Migrated, Filer |
| 1 | 03/07/2001 | | |
| | 025 RECORD MODIFICATION 1313,00A7,S | | |
| | RECORD MODIFICATION 1313,00A7,SLJ,CL-STATUS -6 | | |
| | | | Migrated, Filer |
| 1 | 03/16/2001 | | |
| | 027 RECORD MODIFICATION 1135,00O5,J | | |
| | RECORD MODIFICATION 1135,00O5,JAF,CL-STATUS -L | | |
| | | | Migrated, Filer |
| 1 | 04/05/2001 | | |
| | 032 RECORD MODIFICATION 1354,00AV,K | | |
| | RECORD MODIFICATION 1354,00AV,KLF,CL-STATUS -6 | | |
| | | | Migrated, Filer |

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|---------------------------------------|--|--------------------------|-----------------------|
| <u>Service To</u> | | <u>Service By</u> | <u>Filed By</u> |
| <u>Issue Date</u> | <u>Service Type</u> | <u>Status Date</u> | <u>Service Status</u> |
| 1 | 10/12/2005 | | |
| | Referral of Account to Collection Agency | | King, Shamara T. |
| 1 | 01/18/2006 | | |
| | Referral of Account to Collection Agency | | King, Shamara T. |
| 1 | 02/23/2009 | | |
| | Motion for Expungement | | King, Shamara T. |
| 1 | 02/25/2009 | | |
| | Referral of Account to Collection Agency | | King, Shamara T. |
| 1 | 05/11/2009 | 05/08/2009 | |
| | Motions Hearing Continued | Date of Service 05/08/09 | |
| | Motion for Expungement | | |
| King, Shamara T. | | | Nicholas, William T. |
| 05/08/2009 | First Class | | |
| Montgomery County District Attorney's | | | |
| Office | | | |
| 05/08/2009 | Interoffice | | |
| Seay, Harry R. | | | |
| 05/08/2009 | First Class | | |
| 1 | 05/13/2009 | 05/13/2009 | |
| Motions Hearing Continued | | Date of Service 05/13/09 | |
| Expungement | | | |
| Montgomery County District Attorney's | | | Nicholas, William T. |
| Office | | | |
| 05/13/2009 | | | |
| Seay, Harry R. | | | |

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|---|----------------------|--------------------------|-----------------------|
| <u>Service To</u> | | <u>Service By</u> | <u>Filed By</u> |
| <u>Issue Date</u> | <u>Service Type</u> | <u>Status Date</u> | <u>Service Status</u> |
| 05/13/2009 | | | |
| 1 | 06/17/2009 | 06/17/2009 | |
| Order Denying Motion for Expungement | | Date of Service 06/17/09 | |
| Montgomery County District Attorney's Office 06/17/2009 | | | Ott, Stanley R. |
| Seay, Harry R. 06/17/2009 | | | |

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CASE FINANCIAL INFORMATION

Last Payment Date: 02/23/2009

Total of Last Payment: -\$361.25

| King, Shamara T. Defendant | <u>Assessment</u> | <u>Payments</u> | <u>Adjustments</u> | <u>Non Monetary Payments</u> | <u>Total</u> |
|---|-------------------|-----------------|--------------------|------------------------------|--------------|
| Costs/Fees | | | | | |
| County Fees (Montgomery) | \$150.00 | -\$150.00 | \$0.00 | \$0.00 | \$0.00 |
| ARB Collect (Montgomery) | \$86.25 | -\$86.25 | \$0.00 | \$0.00 | \$0.00 |
| Firearm Education and Training Fund (158 of 1994) | \$5.00 | -\$5.00 | \$0.00 | \$0.00 | \$0.00 |
| Crime Victims Compensation (Act 96 of 1984) | \$11.25 | -\$11.25 | \$0.00 | \$0.00 | \$0.00 |
| Victim Witness Service (Act 111 of 1998) | \$11.25 | -\$11.25 | \$0.00 | \$0.00 | \$0.00 |
| Judicial Computer Project | \$9.00 | -\$9.00 | \$0.00 | \$0.00 | \$0.00 |
| Domestic Violence Compensation (Act 44 of 1988) | \$12.50 | -\$12.50 | \$0.00 | \$0.00 | \$0.00 |
| Commonwealth Cost - HB627 (Act 167 of 1992) | \$9.60 | -\$9.60 | \$0.00 | \$0.00 | \$0.00 |
| Commonwealth Cost - HB627 (Act 167 of 1992) | \$14.40 | -\$14.40 | \$0.00 | \$0.00 | \$0.00 |
| ATJ | \$1.00 | -\$1.00 | \$0.00 | \$0.00 | \$0.00 |
| Costs/Fees Totals: | \$310.25 | -\$310.25 | \$0.00 | \$0.00 | \$0.00 |
| Fines | | | | | |
| County Fines (Montgomery) | \$121.00 | -\$121.00 | \$0.00 | \$0.00 | \$0.00 |
| Fines Totals: | \$121.00 | -\$121.00 | \$0.00 | \$0.00 | \$0.00 |
| Grand Totals: | \$431.25 | -\$431.25 | \$0.00 | \$0.00 | \$0.00 |

** - Indicates assessment is subrogated